

# **EXHIBIT A-4**

**quinn emanuel trial lawyers**

865 S. Figueroa Street, 10th Floor  
Los Angeles, California 90017

September 11, 2023

Steve Snider





Matter #: 10101-00003

Invoice Number: 101-0000157244

Responsible Attorney: Keith H. Forst

Model Tobacco

For Professional Services through August 31, 2023 in connection with Model Tobacco Dispute with Chris Harrison.

Fees	\$36,770.50
15% Discount	<u>-\$5,515.58</u>
Net Billed Fees	\$31,254.92
Expenses	<u>\$256.19</u>
Net Amount	\$31,511.11
Total Due This Invoice	\$31,511.11
Balance Due from Previous Statement(s)	
Total Balance Due	<u></u>

**Confidential – May include attorney-client privileged and work-product information**

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**Statement Detail**

Date	Timekeeper	Description	Hours
08/08/23	NI1	Review defendants' proposed changes to assignments; correspond with team and client group regarding same.	0.20
08/08/23	KHF	Review email and proposed revisions by Defendants and correspond regarding same (0.3).	0.30
08/10/23	NI1	Prepare for hearing on motion to enforce; confer with S. Snider regarding assignment agreements; prepare response to defendants regarding same.	0.30
08/10/23	ES6	Prepare for filing notice of appearance of JN (0.1).	0.10
08/11/23	KHF	Review and revise email/letter regarding breach (0.4).	0.40
08/14/23	KHF	Discuss hearing and correspond with client, begin outlining points (0.6).	0.60
08/15/23	PH2	Prepare research on prejudgment interest demand for hearing on motion to enforce; correspond with N. Inns regarding same.	1.40
08/15/23	KHF	Review email from client and correspond with opposing counsel (0.3).	0.30
08/16/23	KHF	Prepare for hearing and discuss with team and client (1).	1.00
08/16/23	NI1	Confer with K. Forst regarding hearing on motion to enforce; prepare email update to Court.	0.40
08/17/23	KHF	Prepare for hearing (1).	1.00
08/17/23	NI1	Prepare for hearing on motion to enforce settlement; confer with K. Forst regarding same.	0.60
08/18/23	JWN	Attend hearing on motion to enforce; confer with K. Forst in preparation of same.	1.50
08/18/23	NI1	Prepare for and attend hearing on motion to enforce settlement agreement; prepare proposed judgment in connection with same.	3.70
08/18/23	SXW	Call w/ KAF re: hearing strategy, call w/ KAF re: enforcing judgment.	0.70
08/18/23	KHF	Prepare for and participate in hearing (2.5); discuss hearing with client (0.3); discuss options regarding collecting judgment and research same (1); discuss situation with S. Watson and E. Winston (0.5)	4.30
08/18/23	EDW	Conference with K. Forst re judgment issues.	0.20

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Date	Timekeeper	Description	Hours
08/20/23	SXW	Review and revise draft judgment and related emails.	0.40
08/20/23	KHF	Review draft order (0.2).	0.20
08/20/23	EDW	Review and revise judgment; exchange e-mails with QE team re same.	1.00
08/21/23	NI1	Revise proposed judgment; correspond with S. Snider and opposing counsel regarding same.	0.20
08/21/23	SXW	Emails re: draft judgment.	0.30
08/21/23	EDW	Exchange e-mails with QE team and client re judgment.	0.40
08/22/23	NI1	Revise proposed judgment; research applicable interest rates; correspond with S. Snider, K. Forst, and opposing counsel regarding judgment.	0.50
08/22/23	SXW	Emails re: finalizing judgment.	0.20
08/23/23	KHF	Review opinion by Colombell, discuss same, and correspond with client (1),	1.00
08/23/23	NI1	Analyze report and recommendation from Magistrate Judge; confer with K. Forst regarding same; correspond with team regarding next steps.	0.50
08/23/23	SXW	Review Report and Recommendation and related emails w/ QE team.	0.80
08/23/23	PH2	Analyze order from Magistrate Colombell and prepare memorandum regarding same; conference with K. Forst regarding same.	0.90
08/28/23	NI1	Correspond with G. Doumar regarding K-1s.	0.20
Total Hours			23.60

**Fee Summary**

Attorneys	Init.	Title	Hours	Rate	Amount
Scott L. Watson	SXW	Partner	2.40	1,735.00	4,164.00
Eric D. Winston	EDW	Partner	1.60	1,735.00	2,776.00
Keith H. Forst	KHF	Partner	9.10	1,690.00	15,379.00
Jared W. Newton	JWN	Partner	1.50	1,505.00	2,257.50
Nicholas Inns	NI1	Associate	6.60	1,385.00	9,141.00
Paul Henderson	PH2	Associate	2.30	1,305.00	3,001.50
Case Assistants	Init.	Title	Hours	Rate	Amount

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Emily Sullivan	ES6	Paralegal	0.10	515.00	51.50
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**Expense Summary**

Description	Amount
Local business travel	136.15
Document Reproduction	0.24 per page based on market not cost 35.04
Air travel	85.00
Total Expenses	\$256.19

**quinn emanuel trial lawyers**

quinn emanuel urquhart &amp; sullivan, llp

**Current Invoice Summary**

Matter Name : Model Tobacco

Matter #: 10101-00003

Bill Date: September 11, 2023

Invoice Number: 101-0000157244

Total Fees.....\$31,254.92

Expenses.....\$256.19

Total Due this Invoice.....\$31,511.11

**Payment Due By October 13, 2023****Account Summary**

Balance Due from Previous Statement(s).....

Total Balance Due.....

**Current Account Summary**

Date	Invoice No.	Month of Service	Amount Billed	Payments Applied	Outstanding Amount
09/11/23	101-0000157244	August 2023	\$31,511.11	\$0.00	\$31,511.11

**Please reference invoice number and send check to:****Quinn Emanuel Urquhart & Sullivan, LLP**

865 S. Figueroa St., 10th Floor

Los Angeles, CA 90017

Or Wire fundsto:

City National Bank

555 South Flower St., 12th Floor

Los Angeles, CA 90071

Quinn Emanuel Urquhart &amp; Sullivan, LLP

Deposit Account #210032347

Account Info:

Bank Account:

Abu Dhabi | Atlanta | Austin | Beijing | Berlin | Boston | Brussels | Chicago | Dallas | Doha | Hamburg | Hong Kong | Houston | London  
 Los Angeles | Mannheim | Miami | Munich | Neuilly La Défense | New York | Paris | Perth | Riyadh | Salt Lake City  
 San Francisco | Seattle | Shanghai | Silicon Valley | Stuttgart | Sydney | Tokyo | Washington DC | Zurich

# quinn emanuel trial lawyers

quinn emanuel urquhart & sullivan, llp

Bank ABA No.:

122016066

Swift Code:

CINAUS6L

**References:**

***Invoice number and client name / matter number please***

Tax ID# 95-4004138

REMITTANCE